

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CONSOLIDATED UNDER
CASE NO. 05-10155 PBS

YISEL DEAN, Independent Administratrix of the Estate of
STEVEN DEAN, deceased, and on behalf of all statutory
beneficiaries,
Plaintiff,

v.

RAYTHEON COMPANY, a Delaware corporation,
RAYTHEON AIRCRAFT HOLDINGS, INC. a
Delaware Corporation, RAYTHEON AIRCRAFT
COMPANY, a Kansas Corporation, RAYTHEON
AIRCRAFT CREDIT CORPORATION, a Kansas
Corporation, COLGAN AIR, INC.,
a Virginia Corporation d/b/a US Air
Express,
Defendants.

DOCKET NO: 05cv10155 PBS

LISA A. WEILER, Administratrix of the Estate of SCOTT A.
KNABE, deceased, and on behalf of all statutory beneficiaries,
Plaintiff,

v.

RAYTHEON COMPANY, a Delaware corporation,
RAYTHEON AIRCRAFT HOLDINGS, INC. a
Delaware Corporation, RAYTHEON AIRCRAFT
COMPANY, a Kansas Corporation, RAYTHEON
AIRCRAFT CREDIT CORPORATION, a Kansas
Corporation, COLGAN AIR, INC., a Virginia Corporation
d/b/a US Air Express,
Defendants.

DOCKET NO: 05cv10364 PBS

RAYTHEON DEFENDANTS' RULE 26(a)(1) INITIAL DISCLOSURES

Defendants, Raytheon Company, Raytheon Aircraft Holdings, Inc., Raytheon Aircraft
Company, and Raytheon Aircraft Credit Corporation, by and through their undersigned
counsel, make the following initial disclosures pursuant to Federal Rule of Civil Procedure
26(a)(1):

A. Persons Likely to Have Discoverable Information that Defendant May Use to Support its Defenses

Defendants incorporate by reference all Rule 26 disclosures and discovery previously produced to counsel for plaintiff from the related Virginia litigation captioned, *Colgan Air, Inc. vs. Raytheon Aircraft Company*, filed in the United States District Court for the Eastern District of Virginia, Case Number 1:05 cv 213 (hereinafter referred to as “Colgan”). Most, if not all, of the witnesses identified and produced in the Colgan case are pertinent to the present case.

B. Documents in Possession/Control of Defendant That May Be Used To Support its Defenses which have been previously produced to plaintiff’s counsel in the related Virginia case:

Defendants incorporate by reference all Rule 26 disclosures and discovery previously produced to counsel for plaintiff from the related Virginia litigation captioned, *Colgan Air, Inc. vs. Raytheon Aircraft Company*, filed in the United States District Court for the Eastern District of Virginia, Case Number 1:05 cv 213 (hereinafter referred to as “Colgan”). Most, if not all, of the documents identified and produced in the Colgan case are pertinent to the present case.

C. Computation of Damages Claimed by Disclosing Party:

Not Applicable

D. Insurance Agreements:

A copy of the Manufacturers Products/Grounding Liability Policy was provided to counsel for plaintiff with defendants’ initial disclosures made in the Colgan case.

Discovery in this case is expected to mirror discovery already done in the Colgan case, but some additional discovery is expected. Defendant will update the Rule 26 disclosures as additional information is learned through discovery. There will likely be

additional documents and witnesses identified throughout the course of discovery. Those documents and witnesses will be disclosed when they become known to counsel.

Raytheon Defendants,
RAYTHEON COMPANY, RAYTHEON
AIRCRAFT HOLDINGS, INC., RAYTHEON
AIRCRAFT COMPANY, and RAYTHEON
AIRCRAFT CREDIT CORPORATION
By Counsel,

/s/ Gary W. Harvey

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 12th day of October, 2005, a true and correct copy of the above and foregoing RAYTHEON DEFENDANTS' RULE 26(a)(1) INITIAL DISCLOSURES was sent in the United States mail, postage prepaid and properly addressed to:

For Defendant Colgan Air

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/s/ Gary W. Harvey
